

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

MDL No. 16-2738 (MAS) (RLS)

Motion Day: TBD

**NOTICE OF MOTION TO
COMPEL DEPOSITION
TESTIMONY OF PAUL HESS AND
FOR SANCTIONS**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that on a date to be determined by the parties and the Court, the undersigned counsel, pursuant to Federal Rules of Civil Procedure 16, 30, and 37 will bring Defendants Johnson & Johnson and LLT Management LLC (“Defendants”)’s Motion to Compel Deposition Testimony of Paul Hess and Appropriate Sanctions:

Defendants request that oral argument be held in connection with this motion.

Dated: July 22, 2024

Respectfully submitted,

/s/ Kristen R. Fournier

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